South Carolina Department of Health and Environmental Control

#18
A047357

600 Bull Street
Columbia, S.C. 29201

Commissioner
Michael D. Jarrett

Board
Toney Graham, Jr., M.D., Chairman
Henry S. Jordan, M.D., Vice-Chairman
John B. Pate, M.D., Secretary
William E. Applegate
Oren L. Brady, Jr.
John Hay Burriss
Euta M. Colvin, M.D.

August 3, 1989

Dan W. Reicher, Esquire
Natural Resources Defense Council
350 New York Avenue, NW, Suite 300
Washington, DC 2005

John B. Grimball
Assistant U.S. Attorney
1100 Laurel Street
P. O. Box 2266
Columbia, SC 29202

Lucy M. Knowles, Esquire
Office of Chief Counsel
U.S. Department of Energy
Savannah River Site
P. O. Drawer A
Aiken, SC 29802

James S. Chandler, Jr., Esquire
South Carolina Environmental Law Project
P. O. Box 279
Pawleys Island, SC 29585

Stephen Rogers, Esquire
U.S. Department of Justice
L'Enfant Plaza Station
P. O. Box 23986
Washington DC 20026-3986

Re: Closure Plan for Met Lab and Acid/Caustic basins
Amendment to Consent Decree

Ladies and Gentlemen:

Enclosed please find a filed and clocked-in copy of the Amendment to Consent Decree in the above-matter, signed by Charles E. Simons, Jr., United States District Judge, dated July 21, 1989.

Very truly yours,

Samuel L. Finklea

Samuel L. Finklea,
Staff Counsel

SLF:bt
Enclosure

Office of General Counsel Tel: (803) 734-4910 Fax: (803) 734-5519

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
AIKEN DIVISION

FILED

Columbia, S. C.

Natural Resources Defense Council, Inc., Energy Research Foundation, League of Women Voters of South Carolina, and Georgia Conservancy, Plaintiffs, South Carolina Department of Health and Environmental Control, Intervenor-Plaintiff, vs. John S. Herrington, Ernest C. Baynard, III, and U.S. Department of Energy, Defendants.	AMENDMENT TO CONSENT DECREE Civil Action 1:85-2583-6

ENTERED
7-31-89

This matter comes before the Court by consent of the parties and pursuant to the provisions of Section XXI(D) of the Consent Decree approved by the Court on May 26, 1988 (the Decree).

IT APPEARING TO THE COURT that:

1) Defendant Department of Energy (DOE) owns and is responsible for a facility known as the Metallurgical Laboratory Basin (Unit 904-110G) which is subject to Subtitle C of the Resources Conservation and Recovery Act, 42 U.S.C. §6901 et seq. (RCRA). Pursuant to Section III(E) of the Decree, DOE will close the basin in accordance with RCRA and applicable state law and regulations.

2) Similarly, DOE owns and is responsible for facilities known as the Acid/Caustic Basins (Units 904-74G, -75G, -78G, and -80G). Pursuant to Section IV(E) of the Decree, DOE will close

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the Acid/Caustic Basins.

3) Pursuant to Regulation 61-79, "Hazardous Waste Management Regulations", 25 S.C. Code Ann. R.61-79.265.112, a written closure plan is required before a hazardous waste facility can be closed.

NOW THEREFORE IT IS ORDERED that on or before July 7, 1989, DOE shall submit to DHEC written closure plans for the Metallurgical Laboratory Basin and the Acid/Caustic Basins, such plans to comply with the requirements of R.61-79.265.112.

AND IT IS SO ORDERED this 21st day of July, 1989.

#2.

Charles E. Simons, Jr.
United States District Judge

WE CONSENT:

PLAINTIFFS

Natural Resources Defense Council
1350 New York Avenue, NW
Suite 300
Washington, DC 20005

Energy Research Foundation
Columbia, SC

S.C. League of Women Voters
2830 Devine Street
Columbia, SC 29205

Georgia Conservancy

SC Department of Health and
Environmental Control
2600 Bull Street
Columbia, SC 29201

DEFENDANTS

Assistant U.S. Attorney
District of South Carolina
1100 Laurel Street
Columbia, SC 29202

FILED

MAY 31 1988

ANN A. BIRCH, CLE
COLUMBIA, S.

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
AIKEN DIVISION

ENTERED
6-1-88

Natural Resources Defense Council, Inc., et al., Plaintiffs, South Carolina Department of Health and Environmental Control, Intervenor-Plaintiff, v. John S. Herrington, Secretary, United States Department of Energy, et al., Defendants.	CIVIL ACTION NO. 1:85-2583-6

CONSENT DECREE

WHEREAS, on September 24, 1985, the Natural Resources Defense Council (NRDC), Energy Research Foundation (ERF), South Carolina League of Women Voters (LWV), and the Georgia Conservancy (GC) filed a complaint in the above-captioned case against the United States Department of Energy (DOE), and Secretary John S. Herrington and Acting Assistant Secretary William E. Vaughan in their official capacities;

WHEREAS, the South Carolina Department of Health and Environmental Control (SCDHEC) was granted Plaintiff-Intervenor status in this case;

WHEREAS, Plaintiffs allege that DOE has violated various provisions of the Resource Conservation and Recovery Act, 42 U.S.C. Section 6901 et seq., the South Carolina Hazardous Waste Management Act, S. C. Code Ann. Section 44-56-10 et seq., and applicable federal and state regulations at the Department's Savannah River Plant (SRP) in South Carolina;

WHEREAS, there is considerable dispute between the parties regarding the applicability of RCRA to various waste sites at SRP;

WHEREAS, the parties wish to ensure the safe and environmentally sound management of hazardous and mixed waste at the SRP;

WHEREAS, the parties have agreed on the resolution of all issues, except for the issue of the authority of SCDHEC to assess fines and penalties against DOE under RCRA; and

WHEREAS, the parties wish to resolve this action to avoid protracted litigation and do, therefore, agree that it is in the public interest to enter into this Consent Decree, without adjudication of the issues contained herein;

NOW THEREFORE, it is hereby ordered, adjudged and decreed as follows:

I.

JURISDICTION

The Court has jurisdiction over this matter and the parties to the decree.

II.

GENERAL PROVISIONS

1. For purposes of this Consent Decree, the following words and abbreviations have the meanings provided below:

(a) "DOE" means the United States Department of Energy;

(b) "Emergency" constitutes any situation which presents an imminent threat to human health or the environment;

(c) "NRDC" means the Natural Resources Defense Council, Energy Research Foundation, S.C. League of Women Voters and The Georgia Conservancy;

(d) "RCRA" means the Resource Conservation and Recovery Act, 42 U.S.C. Section 6901, et seq.;

(e) "SRP" means The Savannah River Plant;

(f) "SCDHEC" means The South Carolina Department of Health and Environmental Control;

(g) "EPA" means the United States Environmental Protection Agency, Region IV.

III.

UNIT 904-110G: METALLURGICAL LABORATORY BASIN

A. Based on available information, the Metallurgical Laboratory Basin (Unit 904-110G) and the associated Carolina Bay are subject to Subtitle C of RCRA.

B. DOE will amend Part A of its RCRA permit application to include this basin and Carolina Bay within thirty (30) days of entry of this Consent Decree.

C. DOE will amend Part B of its RCRA permit application to include this basin within 180 days after the Part B is requested by SCDHEC.

D. DOE will conduct groundwater monitoring of the basin in accordance with RCRA, the South Carolina Hazardous Waste Management Act, and associated regulations.

E. DOE will close the basin, and associated Carolina Bay which has received overflow, in accordance with RCRA, the South Carolina Hazardous Waste Management Act, and associated regulations.

F. DOE will obtain a Post-Closure Care Permit from SCDHEC and undertake corrective action and post-closure care, if necessary, in accordance with its terms.

IV.

UNITS 904-74G, 75G, 78G, 80G: ACID/CAUSTIC BASINS

A. Based on available information, the Acid/Caustic Basins (Units 904-74G, 75G, 78G, 80G) are subject to Subtitle C of RCRA.

B. DOE will amend Part A of its RCRA permit application to include these basins within thirty (30) days of entry of this Consent Decree.

C. DOE will amend Part B of its RCRA permit application to include these basins within 180 days after the Part B is requested by SCDHEC.

D. DOE will conduct ground water monitoring of the basins in accordance with RCRA, the South Carolina Hazardous Waste Management Act, and associated regulations.

E. DOE will close the basins in accordance with RCRA, the South Carolina Hazardous Waste Management Act, and associated regulations.

F. DOE will obtain a Post-Closure Care Permit from SCDHEC and undertake corrective action and post-closure care, if necessary, in accordance with its terms.

V.

UNIT 643-28G: MIXED WASTE MANAGEMENT FACILITY

A. The Mixed Waste Management Facility (Unit 643-28G) is subject to Subtitle C of RCRA.

B. DOE has amended Parts A and B of its RCRA permit application to include this unit.

C. DOE will conduct ground water monitoring of the unit in accordance with RCRA, the South Carolina Hazardous Waste Management Act, and associated regulations.

D. DOE will close the unit in accordance with RCRA, the South Carolina Hazardous Waste Management Act, and associated regulations.

E. DOE will obtain a Post-Closure Care Permit from SCDHEC and undertake corrective action and post-closure care, if necessary, in accordance with its terms.

VI.

UNITS 904-53G, 54G, 55G: SAVANNAH RIVER LABORATORY SEEPAGE BASINS

A. These basins shall be closed in accordance with the process outlined below. Nothing in this Consent Decree, nor any actions taken in carrying out the process outlined below, shall be construed as an admission that these basins are subject to Subtitle C of RCRA.

B. Within sixty (60) days of the date that it is determined that there is a statistically significant increase in any of the parameters specified in DHEC R.61-79.265.92(b)(1)-(3), DOE shall prepare and submit to SCDHEC a conventional groundwater quality assessment/corrective action feasibility plan. The assessment plan shall include a timetable and provisions for assessing groundwater quality including sampling and analysis for contaminants regulated in SCDHEC R. 61-68(E)(11), Quality Standards for Class GB Ground Waters. The plan shall be implemented in accordance with a schedule approved by SCDHEC.

C. Prior to preparing the closure plan for these basins, each basin will be characterized and data on the basin will be

reduced to written form in a Technical Data Summary (TDS) and submitted as information by DOE to SCDHEC and NRDC for review. The information to be included in the TDS shall be as listed in Attachment 1. The TDS will be submitted to SCDHEC and NRDC within thirty (30) days of the date of entry of this Consent Decree.

D. After the TDS has been reviewed and commented upon by SCDHEC and NRDC, a Site Assessment (SA) shall be performed by SRP. The SA Report shall include the matters listed in Attachment 2, and shall be submitted as information to SCDHEC and NRDC within sixty (60) days after SRP's receipt of comments from SCDHEC and NRDC on the TDS.

E. Within one hundred twenty (120) days of SRP's receipt of SCDHEC and NRDC comments on the SA, SRP shall submit a closure plan to SCDHEC and NRDC. The closure plan shall include the items listed in Attachment 3.

F. The SCDHEC review of the closure plan shall be conducted consistent with the procedural requirements applicable to RCRA closure plans, including, but not limited to, public notice, commenting, and the right to an adjudicatory hearing and judicial review. In reviewing and approving the substance of the Closure Plan, SCDHEC shall apply such standards as appropriate based on available data; however, the standards applied shall insure a level of protection of human health and the environment equivalent to that required under 40 CFR 264 Subpart G.

G. Within ninety (90) days of receiving final SCDHEC approval of the closure plan, SRP shall initiate closure activities for these basins. Post closure care, if necessary, shall be conducted in a manner specified by SCDHEC. However, in reviewing and approving the substance of DOE's plans for post closure care, SCDHEC shall insure a level of protection of human health and the environment equivalent to that under 40 CFR 264 Subpart G.

VII.

UNIT 904-102G: NEW TNX BASIN

A. This basin shall be closed in accordance with the process outlined in Section VI, except that the process shall begin with the submission of a TDS to SCDHEC and NRDC within thirty (30) days after the New TNX Basin stops receiving influent, or by August 1, 1988, whichever occurs first. Also, the SA report shall be submitted to SCDHEC and NRDC within ninety (90) days after receipt of comments from SCDHEC and NRDC on the TDS. Nothing in this Consent Decree, nor any actions taken in carrying out the closure process required herein, shall be construed as an admission that this basin is subject to Subtitle C of RCRA.

VIII.

LEAKING M-AREA STORAGE TANKS

Based on information currently available to SCDHEC and NRDC, and subject to the provisions of Sections XVI.B. and

XXI.D. herein, the storage tanks in M-Area are not in violation of 42 U.S.C. 6925(a), 42 U.S.C. 6930(a), nor 40 CFR 265 subpart F.

IX.

OTHER SITES

Based on information currently available to SCDHEC and NRDC, and subject to the provisions of Sections XVI.B. and XXI.D. herein, all other sites identified in Tables 1-A and 1-B of Defendant's Response to Plaintiff's First Set of Interrogatories (Attachment 4) and, in addition, the Ford Building Seepage Basin (904-91G), are not in violation of 42 U.S.C. 6925(a), 6930(a) and their implementing regulations contained in 40 CFR 124, 265, 270 and SC R.61-79.124, .265 subparts F and G, and .270.

X.

UNIT ACCESS

DOE will provide access to its SRP facility during normal business hours, upon request, to authorized representatives of the SCDHEC for the purpose of monitoring, sampling, and observing activities carried out under this Consent Decree. SCDHEC agrees that its representatives will comply with all rules and regulations established by DOE for the protection of health, safety, and security while on DOE property. This paragraph shall

not be construed to eliminate or restrict any state access to SRP which SCDHEC may otherwise have under Federal or State law.

XI.

SPLIT SAMPLES

Upon request by an authorized representative of SCDHEC, DOE will allow SCDHEC to receive split samples of any samples collected by DOE pursuant to this Consent Decree. DOE shall notify SCDHEC not less than ten (10) business days in advance of any sample collection for which SCDHEC has indicated that it may wish to obtain split samples. Upon request by an authorized representative of DOE, SCDHEC will allow DOE to receive split samples of any samples collected by SCDHEC pursuant to this Consent Decree.

XII.

EXCHANGE OF DATA

A. SCDHEC and DOE's representatives will cooperate in the reporting and exchange of data developed pursuant to this Consent Decree. Results of all sampling and analyses, and other relevant data generated by the parties, their agents or contractors pursuant to this decree, will be exchanged. If requested, the raw data, field notes, and laboratory bench sheets and reports generated will be provided.

B. DOE shall make available to SCDHEC any documents or information in its possession which relate in any reasonable way

to the actions taken pursuant to this Consent Decree, and shall provide SCDHEC with copies of any such documents or information at its request; provided that, for purposes of this paragraph, opinions of inside and outside counsel and documents protected by attorney-client or attorney work product privilege or other privileges recognized by Federal or South Carolina law, if any, are not required to be produced.

XIII.

DELAY OR PREVENTION OF PERFORMANCE

A. Any failure by DOE or its contractors to comply with the terms of this Consent Decree shall be excused, and the time for performance extended, to the extent such failure is caused by circumstances beyond their control or not reasonably foreseeable. Such cirumstances shall be construed to include: Acts of God, Acts of War, strikes, delays in obtaining required permits, and adverse weather. DOE will notify SCDHEC within three (3) days of learning of any such delay, and will submit a written explanation therefor.

B. If SCDHEC and NRDC agree that a delay is or was excusable, the parties shall modify the time deadlines in this Consent Decree to provide such additional time as may be necessary to allow the completion of the work in question and/or any succeeding phase of the work affected by such delay, not to exceed the actual duration of the delay.

C. If SCDHEC, NRDC and DOE cannot agree on whether the reason for the delay was excusable, or whether the duration of the delay is or was warranted under the circumstances, the dispute resolution provisions of Paragraph XIV shall apply.

XIV.

RESOLUTION OF DISPUTES

A. Any dispute which arises with respect to the meaning or application of this Consent Decree shall in the first instance be the subject of informal negotiations between and among SCDHEC and/or NRDC and DOE. If the parties cannot resolve the dispute within thirty (30) days from the time the dispute arises, then any party may file a petition with this Court setting forth the matter in dispute and the relief requested. In an emergency, any party may file a petition prior to the expiration of the thirty (30) day period. The period for negotiations may be extended by mutual agreement between the parties.

B. Unless provided for herein, this Consent Decree does not establish burdens of proof or standards, timing, or jurisdiction for review, but only the procedures applicable to the resolution of disputes between the parties.

XV.

NOTICES

Whenever, under the terms of the Consent Decree, notice is required to be given, a report or other document is required to be forwarded by one party or another, or service of any papers or process is necessitated by the Dispute Resolution provisions of Paragraph XIV, it shall be directed to the following individuals at the addresses specified below:

As to DOE:

Assistant Manager for Health,
Safety and Environment
Savannah River Operations Office
U. S. Department of Energy
Post Office Box A
Aiken, SC 29802

As to SCDHEC:

Chief, Bureau of Solid and Hazardous Waste Management
S. C. Department of Health and
Environmental Control
2600 Bull Street
Columbia, SC 29201

As to NRDC:

James S. Chandler, Jr., Esquire
Post Office Box 8296
Columbia, SC 29202

and

Dan W. Reicher, Esquire
Natural Resources Defense Council
1350 New York Avenue, NW
Suite 300
Washington, DC 20005

XVI.

RELEASE

A. NRDC and SCDHEC hereby release, covenant not to sue, and not to bring action against the United States, any department or agency thereof, or any contractor or subcontractor of DOE, or any past or present official or employee thereof with respect to the claims contained in Counts I-IV of the Complaint filed in this action as they relate to the sites listed in Tables 1-A and 1-B of Defendants Response to Plaintiffs First Set of Interrogatories (Attachment 4) and The Ford Building Seepage Basin, except as to the issue of fines and penalties reserved in the preamble of this Consent Decree.

B. This release shall not affect the right of SCDHEC and NRDC to petition the Court to modify the terms and conditions of this Consent Decree, if information presently unavailable to SCDHEC and/or NRDC, or undetected conditions arise or are discovered after entry of this Consent Decree.

XVII.

USE OF DECREE

The Consent Decree was negotiated and executed by the parties in good faith to avoid expensive and protracted litigation and is a settlement of claims which were vigorously contested, denied, and disputed as to validity. The execution of this Consent Decree is not an admission of liability of any issue dealt with in this Consent Decree. Accordingly, it is the intention of the parties and the parties hereby agree, that with

the exception of this proceeding and any other proceeding contemplated by this Consent Decree, this Consent Decree shall not be admissable in any judicial or administrative proceeding except that involving attorneys' fees. Also, this Consent Decree is not enforceable by persons who are not parties to this agreement.

XVIII.

PERMITS AND APPROVALS

A. SCDHEC will issue or cause to be issued in a timely fashion all necessary permits to DOE to carry out the work required under this Consent Decree provided DOE is entitled to such permits under federal or state law or regulations. SCDHEC agrees to use reasonable efforts within its authority to provide assistance to obtain such permits and approvals. This paragraph, however, shall not be construed to exempt DOE from any substantive or procedural requirement related to the acquisition of such permits or approvals, nor shall it be construed to alter any burden of proof related to acquiring such permits and approvals.

B. The standards and provisions of Paragraphs XIII and XIV shall govern delays in obtaining permits required for the work to be done under this Consent Decree, the denial of any such permits, or difficulties due to the imposition of requirements not set forth in or contemplated by this Consent Decree.

XIX

FUNDING

DOE's implementation of the terms of this Consent Decree and actions herein are subject to availability of appropriated funds for such purposes. If appropriated funds are not available to fulfill the obligations contained herein, NRDC and SCDHEC reserve the right to initiate such action as they deem appropriate, to the extent permitted by law.

XX.

ATTORNEYS' FEES

Defendants agree to pay the costs of litigation (including reasonable attorney and expert witness fees) to the Plaintiffs in an amount deemed appropriate by the Court.

XXI.

MISCELLANEOUS

A. The parties acknowledge that contractors or subcontractors doing work on the SRP, may perform work required under this Consent Decree. DOE shall ensure that all of the contractors conducting work on the SRP comply with the provisions of this Consent Decree.

B. This Consent Decree shall terminate upon written notification by DOE to SCDHEC and NRDC, respectively,

that compliance with all terms and conditions of the Decree applicable to them have been achieved, and upon written agreement from SCDHEC and NRDC. If only monitoring and reporting requirements remain, this shall be considered completion of compliance requirements for the purposes of this Decree, and such monitoring and reporting requirements shall be enforced by SCDHEC and NRDC through the administrative process.

C. The Court shall maintain jurisdiction of the claims of SCDHEC and NRDC for the purpose of enabling the parties to apply to the Court for any further orders that may be necessary to construe, carry out, modify, terminate, or enforce compliance with terms and conditions set forth in the Consent Decree.

D. Nothing in this Consent Decree nor any actions taken in carrying out the process outlined herein shall affect DOE's obligations under Sections 3004(u) and 3004(v) of RCRA.

E. Upon notification by the parties that all terms and conditions of this Decree have been achieved, the parties will move the Court to vacate this Consent Decree and dismiss the case with prejudice.

Respectfully submitted,

Natural Resources Defense Council
1350 New York Avenue, NW
Suite 300
Washington, D.C. 20005

U.S. Department of Justice
L'Enfant Plaza Station
Post Office Box 23986
Washington, DC 20026-3986
(202) 282-2250

Frances Clare Hart
Energy Research Foundation
1916 Barnwell Street
Columbia, SC 29201

John B. Tinkhall
Assistant United States Attorney
District of South Carolina
1100 Laurel Street
Columbia, SC 29202

Mary T. Kelly
S.C. League of Women
Voters
2830 Devine Street
Columbia, SC 29205

Office of General Counsel
U.S. Department of Energy
James Forrestal Building
1000 Independence Ave., S.W.
Washington, DC 20585
(202) 282-2250

Robert Kerr
Georgia Conservancy

James D. Bauer
Office of Chief Counsel
U. S. Department of Energy
Savannah River Operations Office
Post Office Box A
Aiken, SC 29802

Michael D. Jarrett
South Carolina Department of
Health and Environmental Control
2600 Bull Street
Columbia, SC 29201
(803) 734-4910

ORDER

The Court finds that the above Consent Decree entered into by the parties is a just, fair, and equitable resolution of the issues raised in the above-entitled action. Compliance with the terms and provisions of the Consent Decree is directed.

SO ORDERED this 26th day of May, 1988.

Charles E. Simons, Jr.
Charles E. Simons, Jr.
United States District Judge

88/G/1

A TRUE COPY
Attest: [illegible], Clerk
By: [illegible]
Deputy Clerk

ATTACHMENT 1

OUTLINE FOR SRP WASTE SITE TECHNICAL DATA SUMMARY

I. Introduction and Summary

A. Location of waste site
B. Brief description of characterization plan
C. Summary of analytical results

II. Background

A. Geographic location

1. Coordinates (SRP, Lat/Lon)
2. Site dimensions

B. Operational history

1. Process influent facts/types of wastes disposed of at the site and amounts
2. Period of operation
3. Current status

C. Site description

1. Basic discussion of hydrologic information at the waste site (including water table maps, topographic maps, hydrologic data, etc.)
2. Ecological setting (wildlife, wetlands)

III. Characterization Plan

A. Sampling plan description

1. Number and locations of samples (including diagram of sampling locations and monitoring wells)
2. Depth of samples taken
3. Description of sampling procedures

B. Analytical requirements for samples

1. Parameters analyzed and methods used

IV. Analytical Results

A. Results of soil analyses
B. Results of groundwater analyses
C. Results of liquid analyses (if applicable)
D. Results from additional studies (such as HP analyses, microbiology screening data, soil gas analyses, etc.)

OUTLINE FOR SRP WASTE SITE TECHNICAL DATA SUMMARY
(Continued)

V. Quality Assurance

A. Discussion of results from spikes and duplicates
B. Qualifiers on data
C. Discussion of sampling and analytical protocol

VI. References

VII. Appendices (as applicable)

A. Waste site field data
B. Soil core, liquid, and groundwater data
C. Groundwater well construction data
D. Microbiology screening data
E. HP survey data/other pertinent data

ATTACHMENT 2

OUTLINE FOR SRP WASTE SITE ASSESSMENT REPORT

I. Introduction and Summary

A. Summary of background information
B. Brief description of closure options considered
C. Recommended closure option

II. Waste Site Characterization

A. Thumbnail sketch of the waste site (identification of the major waste components including toxicological data and discussions of the hazard ranking system)
B. Hydrogeologic setting (potential transport routes of contaminants, areas of concern, including maps)

III. Discussions of Applicable Regulatory Guidelines

IV. Definition of Closure Options

V. Evaluation of Closure Options

A. Exposure assessment (reasonable exposure scenarios, such as direct contact, runoff, groundwater, etc.)
B. Comparison with prescribed regulatory guidelines (e.g., groundwater concentration standards)
C. Definition of basis for selecting recommended option
D. Comparison of closure options

VI. Recommended Closure Option

VII. Quality Assurance

A. Sensitivity analysis of data
B. Other QA discussions as needed

VIII. References

ATTACHMENT 3

OUTLINE FOR SRP WASTE SITE CLOSURE PLAN

I. Introduction and Summary

A. General site description
B. Summary of background information
C. Summary of closure plan

II. Closure Plan

A. Definition of performance standards
B. Discussion of the waste inventory

1. Waste type, quantity, physical state, concentration, maximum inventory, and the disposal method

C. Description of the closure procedures

1. Waste removal process(es) (when applicable)
2. Waste treatment steps (when applicable)
3. Waste disposal location
4. Transportation information (when applicable)
5. Sampling and analyses plans
6. Details of the cover system
7. Equipment decontamination steps (when applicable)
8. Run-on, run-off, infiltration controls
9. Personnel protective equipment (when applicable)
10. Closure schedule
11. Closure costs
12. Quality assurance

III. Post-Closure Program

A. Site inspection and maintenance
B. Groundwater monitoring plan (if necessary)
C. Other monitoring programs (if necessary)

IV. Remedial Action Plan

A. Groundwater remediation (if necessary)
B. Other

V. References

ATTACHMENT 4

16916-28

TABLE IA. SOLID WASTE MANAGEMENT UNITS AT THE SRP

(Active or Storing Solid Waste After 19 Nov 80)

MANAGEMENT UNIT	DESCRIPTION
000-160	SRL OIL TEST SITE
000-1R	R-AREA ASBESTOS PIT
000-220	C-AREA ASBESTOS PIT
000-240	SANITARY SEWAGE SLUDGE DISPOSAL PIT
000-250	H-AREA EROSION CONTROL SITE
000-260	L-AREA EROSION CONTROL SITE
000-270	SUBSTATION 51 EROSION CONTROL SITE
000-280	F-AREA EROSION CONTROL SITE
131-1C	C-AREA EROSION CONTROL SITE
131-1L	L-AREA RUBBLE PIT
131-1P	P-AREA EROSION CONTROL SITE
131-2L	GAS CYLINDER DISPOSAL FACILITY
131-2R	R-AREA RUBBLE PIT
131-3L	L-AREA RUBBLE PIT
131-4L	L-AREA RUBBLE PIT
190-2C	C-AREA ASH PILE
190-K	K-AREA ASH BASIN
190-P	P-AREA ASH BASIN
197-C	C-AREA CPRCB
197-K	K-AREA CPRCB
197-P	P-AREA CPRCB
231-3F	F-AREA RUBBLE PIT
231-3F	F-AREA SCRAP LUMBER PILE
231-4F	BURNA ROAD RUBBLE PIT
290-1F	F-AREA ASH BASIN
290-F	F-AREA ASH BASIN
290-H	H-AREA ASH BASIN
297-F	F-AREA CPRCB
297-H	H-AREA CPRCB
431-2D	D-AREA RUBBLE PIT
484-D	D-AREA WASTE OIL FACILITY
490-1D	D-AREA ASH BASIN
490-2D	D-AREA ASH BASIN
497-D	D-AREA CPRCB
631-2B	CS SCRAP LUMBER PILE
631-3B	CS RUBBLE PIT
631-7B	SRL RUBBLE PIT
643-200	MIXED WASTE MANAGE'T FACIL. (IN 643-70)
709-0B	HAZARDOUS WASTE STORAGE BUILDING
709-0	HAZARDOUS WASTE STORAGE BUILDING
710-U	HAZARDOUS WASTE STORAGE BUILDING
731-2A	A-AREA RUBBLE PIT
741-0	SANITARY LANDFILL
761-100	TNX STORAGE AREA
761-1G	LOWER FATO ROAD SITE
761-3G	ORANGEBURG SITE
761-3G	LUCY SITE
761-4G	F-AREA BORROW PIT
761 5G	FAR POND BORROW PIT

16916-29

TABLE 1A. SOLID WASTE MANAGEMENT UNITS AT THE SRP

(Active or Storing Solid Waste After 19 Nov 80)

MANAGEMENT UNIT	DESCRIPTION
761-60	KATO ROAD SITE
761-70	ROAD F SITE
761-80	SECOND PAR POND ROAD SITE
761-9	40-ACRE HARBOUR SITE
700 2A	A AREA ASH PILE
700 3A	A-AREA CPMCB
904-1010	716-A MOTOR SHOP SEEPAGE BASIN
904-1020	TNX SEEPAGE BASIN (NEW)
904-1100	METALLURGICAL LABORATORY BASIN
904-1120	LOST LAKE (PART OF M-AREA HWMF)
904-1130	FIRE DEPT HOSE TRAINING FACILITY
904-410	F-AREA SEEPAGE BASIN (NO. 1)
904-420	F-AREA SEEPAGE BASIN (NO. 2)
904-430	F-AREA SEEPAGE BASIN (NO. 3)
904-440	H-AREA SEEPAGE BASIN (NO. 1)
904-450	H-AREA SEEPAGE BASIN (NO. 2)
904-460	H-AREA SEEPAGE BASIN (NO. 3)
904-510	M-AREA SETTLING BASIN (UNIT OF M's HWMF)
904-560	M-AREA SEEPAGE BASIN (4)
904-740	F-AREA ACID/CAUSTIC BASIN
904-750	H-AREA ACID/CAUSTIC BASIN
904-780	P-AREA ACID/CAUSTIC BASIN
904-790	L-AREA ACID/CAUSTIC BASIN
904-800	K-AREA ACID/CAUSTIC BASIN

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TABLE 19. SOLID WASTE MANAGEMENT UNITS AT THE SRP

(Status to be Determined, May Have Been Active or Have Stored Solid Waste After 19 Nov 80)

MANAGEMENT UNIT	DESCRIPTION
080-21B	C-AREA ASBESTOS PIT
100-1C	C-AREA ASH PILE
100-C	C-AREA ASH PILE
100-L	L-AREA ASH BASIN
100-R	R-AREA ASH BASIN
231-1F	F-AREA BURNING/RUBBLE PIT
231-F	F-AREA BURNING/RUBBLE PIT
431-1D	D-AREA BURNING/RUBBLE PIT
431-D	D-AREA BURNING/RUBBLE PIT
400-D	D-AREA ASH BASIN
631-1B	CB BURNING/RUBBLE PIT
631-5B	CB BURNING/RUBBLE PIT
631-6B	CB BURNING/RUBBLE PIT
631-8B	3B PUMPHOUSE EROSION CONTROL SITE
731-1A	A-AREA BURNING/RUBBLE PIT
731-4A	A-AREA RUBBLE PILE
731-7B	RUBBLE DISPOSED NEAR OBO-16B
731-A	A-AREA BURNING/RUBBLE PIT
761-9B	FORESTRY RUBBLE PILE
700-A	A-AREA ASH PILE
904-74B	TNX SEEPAGE BASIN (OLD)
904-77B	R-AREA ACID/CAUSTIC BASIN
904-83B	L-AREA OIL AND CHEMICAL BASIN
N04E79	RUBBLE PILE AT BRAB BAY ROAD
N101E81	RUBBLE PILE AT CEMETARY ROAD
N102E80	RUBBLE PILE BETWEEN BRABB & CEMETARY RDS
N104E67	OPEN SCRAP PIT
N105E78	RUBBLE PILE AT ROAD 781.1
N109E81	RUBBLE PILE AT BOUNDARY MARKER 58
N24E43	SCRAP METAL PILE
N63E115	SUNSITE 113 RUBBLE PILE
N4E84	RUBBLE PILE AT BOUNDARY MARKER 63
N8KE127	SUNSITE 720 RUBBLE PILE